

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
SAMSUNG TELECOMMUNICATIONS
AMERICA GENERAL, L.L.C.,
SAMSUNG SEMICONDUCTOR, INC., and
SAMSUNG AUSTIN SEMICONDUCTOR L.L.C.,

Plaintiffs,

v.

ON SEMICONDUCTOR CORP. and
SEMICONDUCTOR COMPONENTS
INDUSTRIES, LLC,

Defendants.

Civil Action No. 06-720 (JJF)

ON SEMICONDUCTOR CORP. and
SEMICONDUCTOR COMPONENTS
INDUSTRIES, LLC,

Plaintiffs,

v.

SAMSUNG ELECTRONICS CO., LTD.,
SAMSUNG ELECTRONICS AMERICA, INC.,
SAMSUNG TELECOMMUNICATIONS
AMERICA GENERAL, L.L.C.,
SAMSUNG SEMICONDUCTOR, INC., and
SAMSUNG AUSTIN SEMICONDUCTOR L.L.C.,

Defendants.

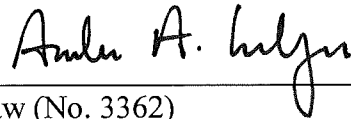
Civil Action No. 07-449 (JJF)

SAMSUNG'S MOTION TO COMPEL DISCOVERY

Samsung Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung
Telecommunications America General, L.L.C., Samsung Semiconductor, Inc., and Samsung

Austin Semiconductor, L.L.C. ("Samsung") respectfully move the Court, pursuant to Fed. R. Civ. P. 37(a), to compel discovery from ON Semiconductor. A proposed form of Order is attached hereto. The grounds for this motion are set forth in Samsung's Opening Brief in Support of Its Motion to Compel Discovery.

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General, L.L.C., Samsung Semiconductor,
Inc., and Samsung Austin Semiconductor,
L.L.C.*

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Dated: August 15, 2008

CERTIFICATE OF SERVICE

I, Andrew A. Lundgren, Esquire, hereby certify that on August 15, 2008, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record:

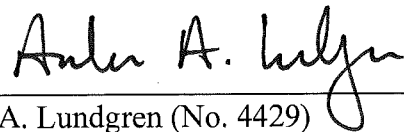
Karen Jacobs Loudon, Esquire [*klouden@mnat.com*]
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I further certify that on August 15, 2008, I caused a copy of the foregoing document to be served by e-mail on the above-listed counsel of record and on the following non-registered participants in the manner indicated:

BY E-MAIL

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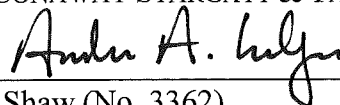
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LOCAL RULE 7.1.1 STATEMENT

I, Andrew A. Lundgren, Esquire, hereby certify pursuant to Local Rule 7.1.1, that counsel for Samsung has made reasonable efforts to reach agreement with counsel for ON Semiconductor on the matters set forth in the present motion.

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ORDER

At Wilmington this ____ day of _____, 2008, upon consideration of Samsung
Electronics Co., Ltd., Samsung Electronics America, Inc., Samsung Telecommunications

America General, L.L.C., Samsung Semiconductor, Inc., and Samsung Austin Semiconductor, L.L.C.'s ("Samsung") Motion to Compel Discovery and all of the evidence and argument submitted therewith, IT IS HEREBY ORDERED that Samsung's Motion is GRANTED.

United States District Judge

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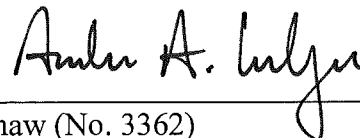
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NOTICE OF MOTION

PLEASE TAKE NOTICE that Samsung Electronics Co., Ltd., Samsung Electronics
America, Inc., Samsung Telecommunications America General, L.L.C., Samsung

Semiconductor, Inc., and Samsung Austin Semiconductor, L.L.C. ("Samsung") will present its Motion to Compel Discovery to the Court on September 12, 2008 at 10:00 a.m.

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